

REMARKS

By this Amendment, claim 19 is amended to correct minor typographical errors and provide antecedent basis for claimed subject matter. Claims 1-20 are pending.

The Office Action rejected claims 1-20 under 35 U.S.C. 103(a) as being unpatentable over Block et al. (U.S. 6,377,938; hereafter “Block”), Carlsson et al. (U.S. 6,026,291; hereafter “Carlsson”) and Picciallo (U.S. 6,044 360). Applicant traverses the rejection because the cited prior art references, analyzed individually or in combination, fail to disclose, teach or suggest the claimed invention. For example, the cited prior fails to disclose, teach or suggest the claimed method comprising “assigning to each subscriber of the subscriber billing group an identification associated with at least one type of access right; and indicating on the basis of the access right, different rights to manage accounts of the subscriber billing group and to carry out predetermined procedures in or between the accounts of the subscriber billing group,” as recited in independent claim 1 and its dependent claims. Similarly, the cited prior art fails to disclose, teach or suggest the claimed system comprising “access right indicators, each indicating a specific right to manage accounts of the subscriber billing group and to carry out predetermined procedures in or between the accounts of the subscriber billing group, an identification for each subscriber, wherein the identification is associated with at least one access right indicator,” as recited in independent claim 7 and its dependent claims, or the claimed network element configured to “recognize a master subscriber that has the right to access the billing group; and allow the master subscriber to carry out predetermined procedures to the accounts of the subscriber billing group,” as recited in independent claim 20.

Block merely describes “a group of trunks, subscriber lines, or services can be identified as a single Billing Group (BG). All the features of the real time subscriber billing system, including prepaid deposits and credit limits, can be applied to the BG as a whole in the same way as previously described for a single subscriber.” (column 13, lines 56 to 65). However, there is no differentiation between subscribers based on assigned access rights associate with an identification of the access rights.

Carlsson fails to remedy this deficiency because Carlsson merely describes “ a system which allows a single user to choose between a default subscription account and at least one other account for call charges” (column 2, lines 3 to 5). Carlsson’s Fig. 1 actually teaches independency between subscriptions, users and terminals (column 2, lines 36 to 37). As a

result, Carlsson fails to teach or suggest a billing group; rather, Carlsson merely discloses a plurality of independent records (105, 110, 115 of Fig. 1).

Picciallo similarly fails to remedy the deficiencies of Block and Carlsson because Picciallo fails to disclose, teach or suggest how to manage accounts, but how to use only one account. Specifically, Picciallo teaches that “holders will be issued magnetic cards to access the funds” (column 3, lines 15 to 16) or “parents making allowance payments to a son or a daughter using the system of the present invention may limit the amount of the payment that may be withdrawn from ATM machines as cash” (column 3, lines 35 to 37). However, in Picciallo, no indication to parents or children is assigned and which is associated with at least one type of access right.

Moreover, Picciallo uses only one account, which is charged when transferring money: “In particular, an account holder pre-establishes an account with a bank” (column 10, lines 25 to 26). “The data processing system is programmed to set up the account with a primary file into which the funds are initially deposited” (column 10, lines 30 to 32) and “the capability to create one or more secondary files into which all or some of the deposited funds may be transferred for access by a third party recipient” (column 10 lines 30 to 35). Thus, Picciallo fails to teach or suggest forming a subscriber billing group comprising two or more accounts or indicating, on the basis of the access right, different rights to manage accounts of the subscriber billing group. Therefore, Picciallo fails to teach or suggest carrying out predetermined procedures in or between a plurality of accounts of a billing group.

In Picciallo, no child can carry out predetermined procedures in or between a plurality of accounts of a billing group. Rather, a parent can carry out transfers of funds between files (column 10, lines 33 to 35), but not between accounts which could be considered part of a subscriber billing group.

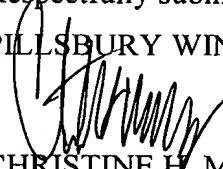
Accordingly, a combination Block, Carlsson and Picciallo would merely lead to a situation where one subscriber had, instead of one, two accounts, yet only one of these accounts would be used for making transfer of funds to children. The combination would not present identification with access rights or ,based on these access rights, different rights to manage accounts of a subscriber billing group and to carry out predetermined procedures in or between the accounts of the subscriber billing group. As a result, the claimed invention is patentable over the combined teachings of Block, Carlsson and Picciallo. Accordingly, claims 1-20 are patentable over the cited prior art.

All objections and rejections having been addressed, Applicant requests issuance of a notice of allowance indicating the allowability of all pending claims. If anything further is necessary to place the application in condition for allowance, Applicant requests that the Examiner contact Applicant's undersigned representative at the telephone number listed below.

Please charge any fees associated with the submission of this paper to Deposit Account Number 033975. The Commissioner for Patents is also authorized to credit any over payments to the above-referenced Deposit Account.

Respectfully submitted,

PILLSBURY WINTHROP SHAW PITTMAN LLP



CHRISTINE H. McCARTHY
Reg. No. 41844
Tel. No. 703 905.2143
Fax No. 703 770.7901

Date: November 7, 2005
P.O. Box 10500
McLean, VA 22102
(703) 905-2000